

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of: **Khatwani et al.**

Serial No. **09/579,256**

Filed: **May 25, 2000**

For: **Method and System for
Incorporation of Graphical Print
Techniques in a Web Browser**

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Group Art Unit: **2176**

Examiner: **Bashore, William L.**

**Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450**

35525
PATENT TRADEMARK OFFICE
CUSTOMER NUMBER

REPLY BRIEF (37 C.F.R. 41.41)

This Reply Brief is submitted in response to the Examiner's Answer mailed on October 5, 2007.

No fees are believed to be required to file a Reply Brief. If any fees are required, I authorize the Commissioner to charge these fees which may be required to IBM Corporation Deposit Account No. 09-0447.

RESPONSE TO EXAMINER'S ANSWER

Appellants continue to maintain all arguments as discussed in the Appeal Brief. Appellants only present arguments in this Reply Brief that provide additional support and clarification or that need further discussion in response to the Examiner's Answer.

Specifically, as discussed in the Appeal Brief, the Examiner uses *Imielinski et al.* (U.S. Patent Application Publication No. 2002/0013792 A1), hereinafter referred to as *Imielinski Publication*, that has a filing date of December 28, 2000 and claims benefit of a Provisional Application (Provisional Application No. 60/173,757), hereinafter referred to as *Imielinski Provisional Application*, which has a filing date of December 30, 1999. Therefore, Appellants respectfully submit that **only** the information disclosed in the *Imielinski Provisional Application* may be used as prior art because any added material in *Imielinski Publication* when filed December 28, 2000 does not qualify as prior art. The Examiner has cited portions of *Imielinski Publication* that contain additional information not found in *Imielinski Provisional Application*. The content of *Imielinski Publication* has increase significantly since the filing of *Imielinski Provisional Application*. The magnitude of change is demonstrated by the claims, for example, since *Imielinski Provisional Application* contains **one claim** and *Imielinski Publication* contains **ninety-nine claims**. New additional information introduced in *Imielinski Publication* that is cited by the Examiner in the rejection of claims includes, for example: virtual pages, **Table 1**, **Figures 4, 9A and 9B**. The cited paragraphs of *Imielinski Publication* contain new details and new information not disclosed in *Imielinski Provisional Application*. In addition, *Imielinski Publication* and *Imielinski Provisional Application* do not contain any of the same Figures; *Imielinski Provisional Application* **only** contains **Figure 1**, which is different from **Figure 1** and **Figure 3** of *Imielinski Publication*. **Figure 3** of *Imielinski Publication* contains new material and modifications different than **Figure 1** of *Imielinski Provisional Application*. Further, *Imielinski Provisional Application* does not contain any Tables. Therefore, Appellants continue to reference *Imielinski Provisional Application* with respect to claim arguments in this response.

In the Examiner's Answer, the Examiner refers to the bottom of page 19. This portion of the Appeal Brief reiterates the Examiner's arguments from the Final Office Action, dated October 5, 2006, which has been provided for the convenience of the Board of Patent Appeals and Interferences.

A. GROUND OF REJECTION (Claims 13-16, 19-24, 27-31, 53-55, 57-58, and 66)

Claims 13-16, 19-24, 27-31, 53-55, 57-58, and 66 are rejected as being obvious under 35 U.S.C. § 103(a) over *Imielinski Publication*. This rejection is respectfully traversed.

As discussed in more detail in the Appeal Brief, the cited portion of *Imielinski Provisional Application* merely mentions transforming a source page by changing the color of frequently accessed segments of the source page. Appellants continue to respectfully submit that *Imielinski Provisional Application* does not teach or suggest receiving a request to **change a font attribute of a selected portion of the first web document**. Additionally, Appellants continue to respectfully submit that *Imielinski Provisional Application* does not teach or suggest creating **a second web document** in the web browser **from the first web document**, wherein the font attribute, within the second web document, of the selected portion is changed **in response to receiving the request to change the font attribute of the selected portion**.

The Examiner alleges that the *Imielinski Provision Application* teaches creating a virtual page or second web document from a first web document using virtual tags. Appellants respectfully disagree. To the contrary, *Imielinski Provision Application* does not mention virtual pages and teaches transforming a web page using virtual tags. Page 1, line 31, through page 2, line 1, states that virtual tags are stored, along with their verbal description, in a virtual tag repository (VTR). The VTR maintains a count of how often each virtual tag has been used and can communicate this information back to the owner of the source page. Page 4, lines 5-7, states that the virtual tag repository **18** is used for storage, retrieval, caching, analysis, and enforcement of virtual tags **14** and the information that they delimit. Page 3, lines 25-26, states that a graphical user interface **12** is used at user system **11** to view and create virtual tags **14** for tagging web pages **13** which are part of world wide web **15**.

Appellants continue to respectfully submit that the *Imielinski Provision Application* fails to teach or suggest the features of claims 13. The other claims in this group are patentable over this cited reference for the same reasons. Accordingly, Appellants respectfully request the rejection of claims 13-16, 19-24, 27-31, 53-55, 57, 58, and 66 under 35 U.S.C. § 103 not be sustained.

In view of the above and the Appeal Brief, Appellants respectfully submit that claims 1-7, 9-12, 17, 25, 32-37, 39-48, 51, 52, 56, 59-65, and 67-70 are allowable over the cited prior art and that the application is in condition for allowance. Accordingly, Appellants respectfully request the Board of Patent Appeals and Interferences to not sustain the rejections set forth in the Final Office Action and in the Examiner's Answer.

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